

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DR. RABBI K.A. ISRAEL, CONSULAR	)	
ATTORNEY, ALSO KNOWN AS	)	
DR. RABBI K. GARTH RICHARDSON, THE	)	
BROTHER OF, AND GUARDIAN FOR,	)	
MS. BEATRICE DEMETRICE GARTH, a disabled)	)	
person,	)	
Plaintiff,	)	07 C 7084
	)	
vs.	)	Honorable Judge
	)	Charles R. Norgle
CIRCUIT COURT OF COOK COUNTY,	)	
ILLINOIS, et. al.,	)	
	)	
	)	
Defendants.	)	

**MOTION FOR LEAVE TO WITHDRAW ATTORNEY'S APPEARANCE FOR  
CIRCUIT COURT OF COOK COUNTY, ILLINOIS AND COMBINED MOTION FOR  
LEAVE TO STAY RESPONSIVE PLEADINGS**

NOW COMES Defendant CIRCUIT COURT OF COOK COUNTY, ILLINOIS by its attorney RICHARD A. DEVINE, State's Attorney of Cook County, through his assistant, Paul W. Groah and pursuant to local Rule 83.17 of the United States District Court, Northern District of Illinois, states as follows:

1. That the Office of the Cook County State's Attorney recently filed an appearance on behalf of the CIRCUIT COURT OF COOK COUNTY, ILLINOIS. (See CM/ECF docket entry # 31). The appearance on behalf of Circuit Court of Cook County, Illinois was filed inadvertently.
2. That Local Rule 83.17 requires an attorney to seek leave of court to withdraw his appearance in the matter.

3. It is anticipated that the Attorney General's Office will be representing the Circuit Court of Cook County, Illinois.
4. Further, after having conversation with counsel of record for ATTORNEY GENERAL LISA MADIGAN, both undersigned counsel and Defendant LISA MADIGAN request stay of responsive pleadings until Plaintiff's newly appointed counsel, Mr. Harry Arger, has had ample opportunity to comply with the initial obligations under Local Rule 83.37. (See CM/ECF docket entry #30, dated February 1, 2008).
5. That Plaintiff will not be prejudiced by the granting of this motion.

WHEREFORE, counsel for the undersigned respectfully requests that this Honorable Court grant the motion to withdraw appearance on behalf of Circuit Court of Cook County, Illinois and stay responsive pleadings for Defendants Lisa Madigan, Attorney General, and Dorothy Brown, Clerk of Court, Circuit Court of Cook County.

Respectfully Submitted,

RICHARD A. DEVINE  
State's Attorney of Cook County

s/ Paul W. Groah  
Paul W. Groah  
Assistant State's Attorney  
Civil Actions Bureau  
500 Richard J. Daley Center  
Chicago, Illinois 60602  
(312) 603-5147

s/ Kathleen L. Ford  
Kathleen L. Ford  
Assistant Attorney General  
General Law Bureau  
100 W. Randolph St. 13<sup>th</sup> Fl.  
Chicago, Illinois 60601  
(312) 814-5160